

Exhibit 13

**HICKMAN-FULTON COUNTIES RURAL ELECTRIC COOPERATIVE
CORPORATION**

**IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE
TELECOMMUNICATIONS ASSOCIATION FOR A DECLARATORY ORDER
THAT THE COMMISSION HAS JURISDICTION TO REGULATE THE POLE
ATTACHMENT RATES, TERMS AND CONDITIONS OF COOPERATIVES
THAT PURCHASE ELECTRICITY FROM THE TENNESSEE VALLEY
AUTHORITY
CASE NO. 2012-00544**

**Response to KCTA's First Requests for Information
dated October 24, 2013**

November 14, 2013

1 **Item 3)** *Provide the legal and factual basis for the statement on page 7 of the*
2 *TVA Cooperatives' Response to the January 17 Order, filed with the Commission on*
3 *February 15, 2013, that states: "The cost-based rates the TVA Cooperatives collect in*
4 *connection with the pole attachment services they provide directly impact the end-*
5 *users' retail rates which are set by the TVA."*

6
7 **Response)** Hickman-Fulton objects to this request insofar as it seeks conclusions of a
8 legal nature which are protected by the attorney-client and attorney-work-product
9 privileges. Notwithstanding this objection, but without waiving it, Hickman-Fulton states
10 as follows.

11 The retail rates approved by the TVA are calculated based on Hickman-Fulton's
12 revenue requirement. TVA's assessment of the revenue requirement takes into account
13 all revenues, including those for pole attachment services. Any change in Hickman-
14 Fulton's pole attachment revenues will necessarily change its revenue requirement and
15 thus directly impact the retail rate set by the TVA. Please see Hickman-Fulton's

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Hickman-Fulton Counties Rural Electric Cooperative Corporation
Response to KCTA 1-3
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**HICKMAN-FULTON COUNTIES RURAL ELECTRIC COOPERATIVE
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November 14, 2013

1 response to KCTA 1-2, and the TVA Cooperatives' Response to the January 17 Order,
2 filed February 15, 2013 in this matter.

3

4 **Witness)** Debbie Weatherford

PENNYRILE RURAL ELECTRIC COOPERATIVE CORPORATION

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4 *connection with the pole attachment services they provide directly impact the end-*
5 *users' retail rates which are set by the TVA."*

6

7 **Response)** Pennyrile objects to this request insofar as it seeks conclusions of a legal
8 nature which are protected by the attorney-client and attorney-work-product privileges.
9 Notwithstanding this objection, but without waiving it, Pennyrile states as follows.

10 The retail rates approved by the TVA are calculated based on Pennyrile's revenue
11 requirement. TVA's assessment of the revenue requirement takes into account all
12 revenues, including those for pole attachment services. Any change in Pennyrile's pole
13 attachment revenues will necessarily change its revenue requirement and thus directly
14 impact the retail rate set by the TVA. Please see Pennyrile's response to KCTA 1-2, and
15 the TVA Cooperatives' Response to the January 17 Order, filed February 15, 2013 in this
16 matter.

**Case No. 2012-00544
Pennyrile Rural Electric Cooperative Corporation
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PENNYRILE RURAL ELECTRIC COOPERATIVE CORPORATION

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2 Witness) Eston Glover

TRI-COUNTY ELECTRIC MEMBERSHIP CORPORATION

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4 *connection with the pole attachment services they provide directly impact the end-*
5 *users' retail rates which are set by the TVA."*

6

7 **Response)** Tri-County objects to this request insofar as it seeks conclusions of a legal
8 nature which are protected by the attorney-client and attorney-work-product privileges.
9 Notwithstanding this objection, but without waiving it, Tri-County states as follows.

10 The retail rates approved by the TVA are calculated based on Tri-County's
11 revenue requirement. TVA's assessment of the revenue requirement takes into account
12 all revenues, including those for pole attachment services. Any change in Tri-County's
13 pole attachment revenues will necessarily change its revenue requirement and thus
14 directly impact the retail rate set by the TVA. Please see Tri-County's response to KCTA
15 1-2, and the TVA Cooperatives' Response to the January 17 Order, filed February 15,
16 2013 in this matter.

**Case No. 2012-00544
Tri-County Electric Membership Corporation
Response to KCTA 1-3
Witness: Paul Thompson
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TRI-COUNTY ELECTRIC MEMBERSHIP CORPORATION

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2 **Witness)** Paul Thompson

WARREN RURAL ELECTRIC COOPERATIVE CORPORATION

IN THE MATTER OF: PETITION OF THE KENTUCKY CABLE
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6

7 **Response)** Warren objects to this request insofar as it seeks conclusions of a legal
8 nature which are protected by the attorney-client and attorney-work-product privileges.
9 Notwithstanding this objection, but without waiving it, Warren states as follows.

10 The retail rates approved by the TVA are calculated based on Warren's revenue
11 requirement. TVA's assessment of the revenue requirement takes into account all
12 revenues, including those for pole attachment services. Any change in Warren's pole
13 attachment revenues will necessarily change its revenue requirement and thus directly
14 impact the retail rate set by the TVA. Please see Warren's response to KCTA 1-2, and
15 the TVA Cooperatives' Response to the January 17 Order, filed February 15, 2013 in this
16 matter.

Case No. 2012-00544
Warren Rural Electric Cooperative Corporation
Response to KCTA 1-3
Witness: Dewayne McDonald
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WARREN RURAL ELECTRIC COOPERATIVE CORPORATION

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2 **Witness)** Dewayne McDonald

WEST KENTUCKY RURAL ELECTRIC COOPERATIVE CORPORATION

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6

7 **Response)** West Kentucky objects to this request insofar as it seeks conclusions of a
8 legal nature which are protected by the attorney-client and attorney-work-product
9 privileges. Notwithstanding this objection, but without waiving it, West Kentucky states
10 as follows.

11 The retail rates approved by the TVA are calculated based on West Kentucky's
12 revenue requirement. TVA's assessment of the revenue requirement takes into account
13 all revenues, including those for pole attachment services. Any change in West
14 Kentucky's pole attachment revenues will necessarily change its revenue requirement and
15 thus directly impact the retail rate set by the TVA. Please see West Kentucky's response

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4 **Witness)** David Smart